

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of New Mexico

United States of America

v.

Dennison Hale

*Defendant(s)***FILED**UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICOCase No. *16-mj-642*

FEB 22 2016

MATTHEW J. DYKMAN
CLERK

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

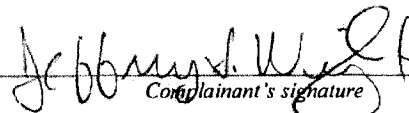
On or about the date(s) of February 20, 2016 in the county of San Juan in the
District of New Mexico, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18 United States Code 1153	Offenses Committed within Indian Country
Title 18 United States Code 1111	Murder

This criminal complaint is based on these facts:


See attached Affidavit, hereby incorporated by reference as if fully restated herein.

☒ Continued on the attached sheet.


Complainant's signature
 Jeffrey T. Wright, Special Agent (FBI)
Printed name and title

Sworn to before me and signed in my presence.

Date: 2-22-2016City and state: Farmington, New Mexico


Judge's signature
 B. Paul Briones, US Magistrate Judge
Printed name and title

NEW MEXICO

ALBUQUERQUE, NEW MEXICO

United States of America)

vs)

DENNISON HALE)

YEAR OF BIRTH: 1973)

SOCIAL SECURITY NUMBER: 525-15-6250)

AFFIDAVIT

I, Jeffrey T. Wright, being duly sworn, do hereby
depose and state:

1. I am a Special Agent (SA) with the United States
Department of Justice, Federal Bureau of Investigation (FBI),
and have been employed in that capacity for approximately seven
and one half years. I am currently assigned to the Albuquerque
Division of the FBI, Farmington Resident Agency, and have
primary investigative responsibility for crimes that occur in
Indian Country, including violent crimes such as homicide,
robbery, aggravated assault, and sexual assault. I am also
responsible for investigating all other federal crimes which
fall within the FBI's purview in the San Juan County area of New
Mexico.

2. The information set forth in this affidavit has been
derived from an investigation conducted by SA Wright, Shiprock
Criminal Investigator (CI) Jefferson Joe (Navajo Department of
Criminal Investigations), and/or communicated to me by other law

1 enforcement officers of the Navajo Nation and witnesses. It is
2 intended to show only that there is sufficient probable cause
3 for the requested warrant and does not set forth all of my
4 knowledge about this matter.

5 3. On the morning of February 20, 2016, at approximately
6 7:38 a.m., CI Joe notified SA Wright of an individual (hereafter
7 referred to as Jane Doe) who was assaulted earlier that morning
8 in Hogback, New Mexico, at a home located approximately 0.3
9 miles east of the Flowing Water Navajo Casino and 0.3 miles
10 north of Highway 64, within the exterior boundaries of the
11 Navajo Nation Indian Reservation. CI Joe further advised that
12 Jane Doe, who was an enrolled member of the Navajo Nation Indian
13 Tribe, was found unresponsive in her home and subsequently
14 transported by helicopter to San Juan Regional Medical Center
15 (SJPMC). Jane Doe's husband, subsequently identified as
16 Dennison Hale, reportedly struck Jane Doe in the head with a
17 shovel after which he fled the scene on foot. Hale is also an
18 enrolled member of the Navajo Nation.

19 4. At approximately 8:22 a.m., SA Wright arrived at the
20 SJPMC's Emergency Room. Attending staff advised that after Jane
21 Doe arrived at the hospital and following life-saving efforts,
22 she was pronounced dead by the attending doctor at 7:57 a.m. A
23 single laceration was visible on Jane Doe's forehead.

24 5. SA Wright subsequently traveled to Jane Doe's residence
25 in Hogback, described further as a small, turquoise house, with
26 a neighboring hogan. The hogan was located approximately 30
27 feet north of the turquoise house. CI Joe was already present
28 at the residence and had previously conducted interviews with

1 Jane Doe's two adult sons (hereafter referred to as Witness 1
2 and Witness 2).

3 6. According to interviews, Jane Doe, Witness 1, Witness 2,
4 and Hale spent the night of February 19, 2016, inside the hogan.
5 Jane Doe and Witness 2 had gone to a dance several hours earlier
6 but returned at approximately 3:00 a.m. Sometime later, Jane
7 Doe began frantically searching the hogan for her cell phone,
8 asking everyone if they had seen it. Witness 1 later observed
9 Jane Doe leave the hogan. Hale immediately followed after her.
10 A few moments later, Witness 1 and Witness 2 heard Jane Doe
11 scream.

12 7. Witness 1 immediately ran outside the hogan and observed
13 Hale running south away from the house. Hale pulled off the
14 jacket he was wearing and dropped it on the dirt road as he ran.
15 Witness 1 started to chase after Hale but subsequently returned
16 to the house to check on Jane Doe.

17 8. Witness 2 also ran outside the hogan to check on Jane
18 Doe after he heard her scream. He observed Hale running away
19 from the house and chased after him. As he got close to Hale,
20 Hale stopped, turned around, and hit Witness 2 in the face with
21 his fist. Hale then ran off, southbound, toward the canal and
22 Witness 2 returned to the house.

23 9. Witness 1 observed Jane Doe inside the turquoise house,
24 lying on her back, on the floor between the kitchen and the
25 living room. She was not moving and only made gurgling noises.
26 Witness 2 saw Jane Doe cough up blood as she lay on her back. A
27 shovel was also seen lying next to Jane Doe. Witness 1
28 subsequently called 911.

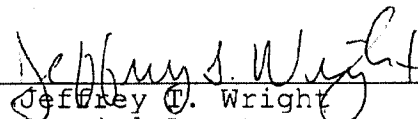
1 10. Pursuant to a Federal Search Warrant, SA Wright and CI
2 Joe processed the scene for evidence. Among the items collected
3 from the living room floor of the turquoise house was a square-
4 nosed shovel, approximately 4'10" in length. A red stain
5 consistent with blood was observed to be on the back of the head
6 of the shovel. Witness 2 stated the shovel was previously left
7 leaning against the exterior wall of the hogan.

8 11. Following the search and prior to Witness 2 learning of
9 Jane Doe's death, Witness 2 stated he was concerned for Jane
10 Doe's safety as two to three days earlier, Hale said something
11 to the effect of, "I'm gonna kill her. No one else could have
12 her."

13 12. Based upon the information provided in this affidavit,
14 your Affiant submits there is probable cause to believe that on
15 the morning of February 20, 2016, Dennison Hale, an enrolled
16 member of the Navajo Nation Indian Tribe, was within the
17 territorial jurisdiction of the Navajo Nation Indian Reservation
18 when he killed Jane Doe by striking her in the head with a
19 shovel, in violation of Title 18, United States Code, Sections
20 1153 (Criminal Offense committed within Indian Country) and 1111
21 (Murder).

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1 13. I swear this information to be true and correct to the
2 best of my knowledge and belief.
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5 
6 Jeffrey T. Wright
7 Special Agent
8 Federal Bureau of Investigation
9 Farmington, New Mexico

10 Subscribed and sworn to before me this 22 day of February, 2016.
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13 United States Magistrate Judge
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